



**NEW YORK CITY HOUSING AUTHORITY
LAW DEPARTMENT**
90 CHURCH STREET • NEW YORK, NY 10007
<http://nyc.gov/nycha>

GREGORY P. RUSS
Chair & CEO

LISA BOVA-HIATT
EVP of Legal Affairs and General Counsel

WRITER'S DIRECT LINE
(212) 776-5259

May 19, 2020

Via ECF

The Honorable Judge Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square, Room 415
New York, New York 10007

Re: *Colon v. The City of New York, et al.*, No. 16-CV-4540
Williams v. The City of New York, et al., No. 16-CV-8193

Dear Judge Broderick:

I am counsel for Defendants New York City Housing Authority ("NYCHA"), Michael Kelly, and Brian Clarke (collectively, "the NYCHA Defendants") in the above-referenced matters, which have been consolidated for pre-trial purposes.

Summary judgment briefing in these matters was fully submitted on May 15, 2020. The parties write jointly in reference to Rules 4.D and E of the Court's Individual Rules & Practices, which require the parties to provide the Court with electronic, text-searchable copies of all transcripts on a CD and with paper courtesy copies of all motion papers. However, providing the Court with these materials at this time does not appear to be possible in light of the Covid-19 emergency and the closure of the Southern District Courthouse and counsel's offices.

Accordingly, counsel respectfully propose that they wait until the re-opening of the Southern District Courthouse and their offices to mail the Court the summary judgment courtesy copies and the CDs containing the transcripts. If the Court wishes, the parties can email the Court text-searchable copies of all transcripts at this time.

Respectfully submitted,

/s/ Jane E. Lippman

cc: Marcel Florestal, Esq. (via ECF)
Natalie Marcus, Esq. (via ECF)